

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC.; VALEANT
PHARMACEUTICALS INTERNATIONAL; and
AGMS, INC.,

Plaintiffs,

v.

AIG INSURANCE COMPANY OF CANADA;
ACE INA INSURANCE COMPANY; ALLIANZ
GLOBAL RISKS US INSURANCE COMPANY;
ARCH INSURANCE CANADA LTD; EVEREST
INSURANCE COMPANY OF CANADA;
HARTFORD FIRE INSURANCE COMPANY;
IRONSHORE CANADA LTD.; LIBERTY
INTERNATONAL UNDERWRITERS; a division
of LIBERT MUTUAL INSURANCE COMPANY;
and LIBERTY MUTUAL INSURANCE
COMPANY; LLOYD'S UNDERWRITERS;
LLOYD'S CONSORTIUM 9885 (a/k/a STARR
FINANCIAL LINES CONSORTIUM 9885);
LLOYD'S SYNDICATE ANV 1861; LLOYD'S
SYNDICATE AMA 1200; LLOYD'S SYNDICATE
ARGO 1200; LLOYD'S SYNDICATE AWH 2232;
LLOYD'S SYNDICATE BRT 2987; LLOYD'S
SYNDICATE CVS 1919; LLOYD'S SYNDICATE
HCC 4141; LLOYD'S SYNDICATE MITSUI 3210;
LLOYD'S SYDNICATE MIT 3210; LLOYD'S
SYNDICATE NAV 1221; LLOYD'S SYNDICATE
QBE 1886; LLOYD'S SYNDICATE SJC 2003;
ROYAL & SUN ALLIANCE INSURANCE
COMPANY OF CANADA; TEMPLE
INSURANCE COMPANY; and XL INSURANCE
COMPANY SE.,

Defendants.

Civil Action No.:
3:18-cv-00493-MAS-LHG

**STIPULATION EXTENDING TIME TO ANSWER, MOVE, OR OTHERWISE
REPLY**

WHEREAS, Plaintiffs filed the Complaint in the above-captioned action on or about December 7, 2017 in the Superior Court of New Jersey Somerset County Law Division;

WHEREAS, Defendants removed this action to the United States District Court for the District of New Jersey on or about January 12, 2018;

WHEREAS, Defendant Lloyd's Syndicate SJC 2003's response to the Complaint is currently due on January 26, 2018;

WHEREAS, Defendant XL Insurance Company SE's response to the Complaint is currently due on January 30, 2018;

WHEREAS, Defendants Lloyd's Syndicate SJC 2003 and XL Insurance Company SE requested an extension of time to respond to the Complaint;

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED that in consideration of the foregoing recitals, Plaintiffs agree to extend the time for Defendants Lloyd's Syndicate SJC 2003 and XL Insurance Company SE to answer, move, or otherwise respond to the Complaint until March 2, 2018.

IT IS FURTHER STIPULATED AND AGREED that a facsimile, photocopy or other electronic reproduction of this Stipulation shall have the same force and effect as the original.

Dated: January 26, 2018

Respectfully submitted,

/s/ Sarah Voutyras

Sarah Voutyras, Esq.
SKARZYNSKI BLACK, LLC
One Battery Park Plaza
32nd Floor
New York, NY 10004
Tel.: (212) 820-7735
Fax: (212) 820-7740
svoutyras@skarzynski.com

*Counsel for Lloyd's Syndicate SJC 2003
and XL Insurance Company SE*

/s/ Sherilyn Pastor

Sherilyn Pastor, Esq.
McCARTER & ENGLISH, LLP
100 Mulberry Street
Four Gateway Center
Newark, NJ 07102
Tel.: (973) 639-2070
Fax: (973) 297-3834
spastor@mccarter.com

Counsel for the Plaintiffs

So Ordered: _____

Dated: _____